



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-060059

FACILITY ID No.: 001-00179

AQCR: 64

CLASS: A

SIC: 3079

ZONE: 11

UTM COORDINATE (km): 548.3, 4814.4

1. **PERMITTEE**
Fiberglass Systems Inc.



2. **PROJECT**
Permit to Construct Revision

3. **MAILING ADDRESS**
4545 Enterprise St.

CITY
Boise

STATE
ID

ZIP
83705

4. **FACILITY CONTACT**
Ray Yehle

TITLE
Director of Regulatory Affairs

TELEPHONE
(208) 342-6823 ext. 237

5. **RESPONSIBLE OFFICIAL**
Gary Multanen

TITLE
Owner/CEO

TELEPHONE
(208) 342-6823, ext. 236

6. **EXACT PLANT LOCATION**
Block 2, Lot 4, Swan Falls Business Park, Kuna, Idaho

COUNTY
Ada

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Fabrication of Fiberglass Reinforced Plastic Composites

8. **GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

ALMER CASILE, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: _____ PUBLIC COMMENT _____

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CO	carbon monoxide
CR	corrosion resistant
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This permit to construct (PTC) revises PTCs issued on May 17,2002 and September 19,2006, in particular the permit conditions addressing applicable requirements under 40 CFR 63, Subpart WWW. The PTCs issued in 2002 and 2006 assumed the source was an existing sources for the purposes of 40 CFR 63, Subpart WWW. This determination was contested by third parties. DEQ requested additional information from the permittee. The permittee responded with an application to be treated as a new source for the purpose of 40 CFR 63, Subpart WWW.
- 1.2 This PTC replaces PTC No. P-000719 and No. P-050035, issued on May 17,2002 and September 19, 2006, respectively, the terms and conditions of which shall no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Coatings applications during fabrication of fiberglass reinforced plastics. Emissions from application process exhaust to Stack EF-1, EF-2, EF-3.	1-inch fiberglass filter (72% efficiency); and fiberglass bulk media filter (84% efficiency)

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060059**Permittee:** Fiberglass Systems Inc.**Location:** Kuna, Idaho**Facility ID No.** 001-00179**2. STACKS EF-1, EF-2, EF-3****2.1 Process Description**

Fabrication of fiberglass reinforced plastics at the permittee's facility involves application of a variety of gel coats, resins, and other materials. These materials are applied using spray guns. The air ventilation system for spray operations exhausts to the atmosphere through Stacks EF-1, EF-2, and EF-3.

2.2 Emissions Control Description

The air ventilation system for spray operations exhausts through a series of two filters to Stacks EF-1, EF-2, and EF-3. The exhaust from the air ventilation system first passes through a 1-inch fiberglass filter (collection efficiency rated at 72% for PM₁₀), and then through a fiberglass bulk media filter (collection efficiency rated at 84% for PM₁₀).

Limitations**2.3 Emissions Limits**

Total emissions of particulate matter (PM), PM₁₀, and total volatile organic compounds (VOCs) from Stacks EF-1, EF-2, and EF-3 shall not exceed any corresponding emission limit listed in Table 2.1 and Permit Condition 2.4.

Table 2.1 EMISSIONS LIMITS

Pollutant	lb/hr	T/yr
PM	2.0	8.8
PM ₁₀	2.0	8.8
Total VOCs		245

[draft]**2.4 MACT Limitations, Work Practice Standards & Compliance Deadlines**

On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable emission limitations, operating limitations and work practice standard of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule

- Emission Limitations: 40 CFR 63.5805; 40 CFR 63, Subpart WWWW, Table 3, 40 CFR 63; Subpart WWWW, Table 5
- Work Practice Standards: 40 CFR 63.5805; 40 CFR 63, Subpart WWWW, Table 4

[draft]**2.5 Opacity Limit**

Emissions from the Stacks EF-1, EF-2, or EF-3, or any other stack, vent, or functionally equivalent opening associated with the coating application process, shall not exceed 20% opacity for a period or

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periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.6 Fugitive Dust Emissions

Fugitive dust emissions, regulated by IDAPA 58.01.01.650, shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Fugitive emissions shall be determined by Environmental Protection Agency Reference Method 22, as described in 40 CFR Part 60, Appendix A or a DEQ-approved alternative method.

2.7 Odorous Emissions

Odorous gases shall not be emitted to the atmosphere in such quantities as to cause air pollution, as required by IDAPA 58.01.01.775.

2.8 Fuel-burning Equipment

The permittee shall burn natural gas exclusively in the fuel-burning equipment at this facility.

2.9 Spray Gun and Filter Specifications

- Low-pressure spray guns shall be used throughout the facility for gel-coat applications. The facility is currently using Magnum Venus models TRT-1000 with 5017 or 7017 tip sizes, IDT 3500 MCC with 960 tips. The spray guns used at the facility shall be functionally equivalent spray guns and tips demonstrated to produce similar volumes, pressures, and emissions.
- Air ventilation system for spray operations shall be equipped with a 1-inch fiberglass filter (collection efficiency rated at 72% for PM₁₀), and then through a fiberglass bulk media filter (collection efficiency rated at 84% for PM₁₀), or filters with equivalent or greater collection efficiencies.

2.10 Reasonable Control of Fugitive Emissions

In accordance with IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.

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- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

Compliance Demonstration Requirements

2.11 On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable compliance demonstration requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule

- Options For Meeting The Standards For Open Molding And Centrifugal Casting Operations At New And Existing Sources: 40 CFR 63.5810, 40 CFR 63.5897
- General Compliance Requirements: 40 CFR 63.5835.
- Performance Test Or Other Initial Compliance Demonstration: 40 CFR 63.5840, 40 CFR 63.5845, 40 CFR 63.5850, 40 CFR 63.5860.
- Continuous Compliance Demonstration: 40 CFR 63.5895, 40 CFR 63.5900,
- Recordkeeping: 40 CFR 63.5905, 40 CFR 63.5910, 40 CFR 63.5915, 40 CFR 63.5920.

[draft]

2.12 Material Usage Records

The permittee shall maintain records that contain, but is not limited to, the following information:

- the name and identification number for each gel-coat, resin, adhesive, catalyst, paint, promoter, styrene, and wax used
- the percent by weight of each VOC in each compound
- gallons and pounds of gel-coat, resin, adhesive, catalyst, paint, promoter, styrene, and wax used
- the actual hours of operation at the facility.

2.13 VOC Emissions Determination Equation

The permittee shall calculate and record on a monthly basis the annual VOC emission rate expressed as tons per any consecutive 12-month period, from the facility to demonstrate compliance with Permit Table 2.1 of Permit Condition 2.3.

[draft]

2.14 Operations and Maintenance Manual for Dust Chamber

Within 60 days of issuance of this permit, the permittee shall have developed an Operations and Maintenance (O&M) Manual for the dust chamber. The manual will describe procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the air pollution control device. The manual shall include, but not be limited to, the following provisions:

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- Inspect the filters weekly for collapse, and record date of inspection.
- Replace filters when collapsed or otherwise not functioning properly.
- Inspect the dust chamber weekly to ensure that it is reasonably tight, and record date of inspection.
- Remove accumulated particulate from the dust chamber weekly in such a manner that the particulate is not emitted into the ambient air, and record the date of particulate removal.
- Maintain negative air pressure inside the building.

2.15 Odor Management Plan

Within 60 days of issuance of this permit, the permittee shall have developed an Odor Management Plan for the facility. The plan shall describe procedures that will be followed to comply with Permit Condition 2.7. The plan shall include, but not be limited to, the following provisions:

- Maintain negative air pressure inside the building.
- Keep all storage containers and vessels closed when not in use.
- Keep the door to the mixing tank room closed while extenders and fillers are being to the resin matrix.

[draft]

2.16 Particulate Matter Performance Test

Within 60 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after initial start-up, the permittee shall conduct a performance test to measure PM and PM₁₀ emissions from Stacks EF-1, EF-2, and EF-3. The performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 6, and the following requirements:

- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The maximum number of spray booths shall be in operation during the performance test run. The number of spray booths in operation shall be recorded, as shall the materials used and throughput in pounds per hour (lb/hr).
- The permittee shall record the fuel-burning equipment in operation during the performance test that exhausts to Stacks EF-1, EF-2, and EF-3, if any.

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2.17 Visible Emissions Monitoring

The permittee shall conduct a quarterly (by calendar), facility-wide inspection of potential point sources of visible emissions during daylight hours and under normal operating conditions. There shall be a minimum of at least 60 days between each inspection. Unless visible emissions are present, no formal Method 9 visible emissions observation is required. If any visible emissions are present from any point of emission, the permittee shall either take corrective action within 24 hours to remedy the cause of the visible emissions, or conduct a Method 9 evaluation of the emissions using the procedures in IDAPA 58.01.01.625. If the corrective action does not eliminate the visible emissions, then a Method 9 visible emission observation shall be required.

If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance.

The permittee shall maintain records of the results of each visible emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time of each inspection, the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), and any corrective action taken. The most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.18 Fugitive Dust Monitoring

The permittee shall conduct weekly facility-wide inspections of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken, and the date the corrective action was taken. The most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

Reporting Requirements

2.19 Operations & Maintenance Manual and Odor Management Plan

Within 60 days of issuance of this permit, the permittee shall submit to DEQ, for approval, the O&M Manual and Odor Management Plan required in Permit Conditions 2.14 and 2.15, respectively.

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2.20 Semiannual Reports

The permittee shall submit to DEQ a semiannual (by calendar) report that includes, but is not limited to, the following:

- the amount of gel-coat and resin used in tons for the month
- calculated total VOC emissions per rolling, consecutive 12-month period
- actual amount of hours spray coating per month occurred at the facility

[draft]

2.21 Performance Test Protocol

The permittee shall submit a test protocol for the performance tests required in Permit Conditions 2.16 to DEQ for approval at least 30 days prior to the test days.

2.22 Performance Test Report

The permittee shall submit a report of the results of the performance tests required in Permit Condition 2.16, including all required process data, to DEQ within 30 days after the date on which the actual stack testing is concluded.

2.23 Permit Application Requirements

The permittee shall submit to DEQ a complete application for an original Tier I operating permit within 12 months of commencing operation.

2.24 On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable notifications and reporting requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule:

- 2.24.1. Notifications: 40 CFR 63.5905; 40 CFR 63, Table 13
- 2.24.2. Initial Compliance Report: 40 CFR 63.5840; 40 CFR 63.5860; 40 CFR 63.5910
- 2.24.3. Semiannual Report: 40 CFR 63.5910

[draft]

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
[Idaho Code §39-101, et seq.]
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
[IDAPA 58.01.01.211, 5/1/94]
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.
[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;

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- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.